

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PENNSYLVANIA PROTECTION AND
ADVOCACY, INC.,

Plaintiff,

V.

DEPARTMENT OF PUBLIC WELFARE
OF THE COMMONWEALTH OF
PENNSYLVANIA, *et al.*,

Defendants.

Civil Action No. 1:CV-00-1582

Judge Caldwell

STIPULATION

Plaintiff and Defendants submit this Stipulation to request that the Court place this case in civil suspense for the following reasons:

1. The parties have reached a Settlement Agreement.
2. Under the terms of the Settlement Agreement, the Plaintiff has the right to reinstate the litigation in its current procedural posture if it is dissatisfied with the Defendants' implementation of the terms, provided that it first gives 45-days' notice to the Defendants.
3. Under the terms of the Settlement Agreement, the parties agreed to request that the Court place the case in civil suspense pending implementation of the Agreement.

4. Under the terms of the Settlement Agreement, the parties will submit a Stipulation of Dismissal after the Defendants have implemented the terms of the agreement.

NOW, THEREFORE, the parties request that the Court place this case in civil suspense pending implementation of the Agreement with the right of either party to reinstate the case on cause shown.

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Date: December 23, 2005

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